

September 7, 2007

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Kevin J. Martin, Chairman
Michael J. Copps, Commissioner
Jonathan S. Adelstein, Commissioner
Deborah Taylor Tate, Commissioner
Robert M. McDowell, Commissioner

Re: Carriage of Digital Television Broadcast Signals, Amendment to Part 76
of the Commission's Rules (MB Docket No. 98-120)

Dear Chairman Martin and Commissioners:

We are writing to express our alarm at the Commission's intent to impose onerous dual carriage mandates on cable operators. We respectfully request that the Commission carefully consider the implications of requiring cable operators to allocate scarce bandwidth for multiple signals of the same "must carry" stations. We fear that the Commission's rule would reduce the diversity of voices on cable – an outcome contrary to the intent of communications policy.

As it stands now, the resources allocated for cable programming are already stretched very thin, requiring that every channel compete for precious carriage. Yet the Commission's proposed rule would only worsen the obstacles that new, innovative and niche programmers face in obtaining carriage. Much like the way *a la carte* regulations would reduce the diversity of voices on cable, dual must carry requirements could be equally damning for cable networks by crowding them out to make room for two and three copies of the same broadcast stations.

A dual carriage mandate would harm cable programmers whose investments, innovation and creativity will be unnecessarily cut off by multiple must carry stations – and it would harm consumers most acutely by limiting their programming options and reducing the diversity of voices on cable.

We hope the Commission acts to prevent this outcome.

Sincerely,

The Africa Channel
Jacob Arback
President

Inspiration Networks
Rod Tapp
Executive Vice President CEO

Outdoor Channel
Roger Werner

Ovation TV
Ron Garfield
COO

TV One
Johnathan Rodgers
President & CEO